

Closing the Gap

Needed Reforms to Implement the FAO Voluntary Guidelines

Benchmarked against the *FAO Voluntary Guidelines for Transshipment (2022)*

All five tuna RFMOs permit at-sea transshipment under their regulatory frameworks. Well-regulated at-sea transshipment operations can provide efficient support to fishing vessels. When poorly regulated, however, at-sea transshipment can undermine effective conservation and management and create opportunities for illegal, unreported and unregulated (IUU) fishing activities.

The *2022 FAO Voluntary Guidelines for Transshipment* provide the first global framework specifically addressing transshipment. These guidelines establish standards against which RFMOs can measure their approaches and identify areas for improvement. *ISSF Technical Report 2026-02* benchmarks the tuna RFMOs' at-sea transshipment measures against the FAO Guidelines and shows that no tuna RFMO achieves full implementation.

This infographic identifies the areas of improvement for all RFMOs alongside targeted measures specific to individual RFMOs. Acting to implement these recommendations would bring tuna RFMO regulation of at-sea transshipment more in line with the FAO guidelines – and strengthen efforts to combat IUU.

KEY:

Reforms for IATTC, ICCAT, IOTC, CCSBT, & WCPFC

 All RFMOs

Reforms specific to each RFMO's operational context

 CCSBT

 IATTC

 ICCAT

 IOTC

 WCPFC

Authorization & Notification

 All RFMOs

4 REFORMS

- Lengthen the timeframe for pre-event notifications (e.g., 48 hours), and ensure both vessels provide a notification specifying date, time, and location and amount to be transhipped
- Establish minimum standards or criteria, using a risk-based approach, that flag States must follow before approving any vessel for at-sea transshipment operations (both donor and receiving)
- Require flag States to document their verification processes and share authorization decisions with RFMOs
- Prohibit vessels from acting as both receiving and offloading vessels on the same trip

 IATTC

3 REFORMS

- Publicize transshipment information on all transshipment events – including locations, product form, and landings
- Ensure C-14-02 applies to all longline vessels engaged in at-sea transshipment
- Receiving vessels should store fish and documentation received from each donor vessel separately. That documentation should be provided to relevant authorities when required. It should be clear which donor vessel each part of the fish comes from.
Receiving vessels should maintain up-to-date stowage plans and other documents showing quantities and locations of species received from each donor vessel. Documentation should be made available to authorities and kept on board until completely unloaded.

 WCPFC

4 REFORMS

- Receiving vessels should store fish and documentation received from each donor vessel separately. That documentation should be provided to relevant authorities when required. Receiving vessels should maintain up-to-date stowage plans and other documents showing quantities and location of species received from each donor vessel. This should remain on board until completely unloaded.
- Shorten the submission deadlines for transshipment declarations (currently 15 days) and observer reports (currently 90–120 days) to support effective MCS
- The observer should provide a report for all transshipment reports (beyond confirming quantities are consistent) to all competent authorities and the relevant RFMO as soon as possible.
- Develop an independent Regional Observer Program to monitor transshipments

Documentation & Data

 All RFMOs

6 REFORMS

- Amend the transshipment declaration to add recommended data fields from the FAO Guidelines, Annex I. The declaration should be transmitted before any landing or subsequent transshipment is authorized.
- Establish a harmonized transshipment declaration for use between and among RFMOs
- Require landing declarations that track intended ports, destinations, and final arrangements
- Require vessels authorized to engage in at-sea transshipment to retain transshipment records on board. A copy should accompany the transhipped fish on the receiving vessel.
- Establish formal procedures for sharing transshipment data between other RFMOs
- Publicize transshipment information on all transshipment events including locations, product form, and landings

Verification & Follow-Up

 All RFMOs

9 REFORMS

- Develop procedures to automatically include vessels with serious infractions on the draft IUU vessel list
- Strengthen procedures for cross-referencing transshipment and landing data, pre-event verification processes, and observer data. Develop control measures that are triggered.
- Adopt requirements to suspend transshipments during ALC system failures; increase frequency of VMS polling
- Establish procedures for flag States to confirm donated fish was taken in line with applicable rules
- Adopt requirements for both donor and receiving vessels intending to transship to notify the relevant RFMO when they enter and exit the RFMO area of competence
- Establish systematic follow-up procedures through RFMO compliance processes
- Require AIS as a backup monitoring tool
- Standardize observer qualification requirements, data collection protocols, and reporting formats
- Align PSM with the FAO PSMA for all ports where receiving vessels land fish

 CCSBT

2 REFORMS

- Record and publicize the list of fishing vessels authorized to transship
- Pilot Program: Rectify issues in the Pilot Program identified in the 2025 Quality Assurance Review

 IOTC

2 REFORMS

- Encourage those Non-Contracting Parties that flag carrier vessels that operate in the IOTC Area of Competence, and which are allowed to continue to do so under Res. 25/05, to become IOTC Contracting Parties or Cooperating Non-Parties
- Pilot Program: Establish measures to address identified weaknesses in the pilot program